



August 14, 2007

Air Permits Section (AR-18J)
Attn: Richard Angelbeck
Air & Radiation Division
U.S. EPA Region 5
77 West Jackson Boulevard
Chicago, IL 60604



Re: Frequency of Performance Testing Requirement
Treasure Island Resort and Casino
Permit No. V-PI-R50004-03-01

Dear Mr. Angelbeck:

As Julie Miller of JEM Environmental, LLC discussed with you in August and October 2006, Energy Alternatives is requesting to change the permit requirement of performance testing for NOx emissions once every three years to performance testing for NOx emissions once every five years. Annual testing for NOx emissions with a portable analyzer would be conducted in the years between performance testing.

The engines at Treasure Island have never exceeded their NOx emission limits since startup, as demonstrated by their initial performance test and subsequent annual tests. Copies of the summary pages from previous NOx emission tests are attached to this letter. In addition, the engines have run significantly fewer hours than the 500 hours per year permit limit, as shown in the table below.

Annual Operating Hours

	Engine 1	Engine 2	Engine 3	Engine 4
2004	103	102	81	34
2005	129	128	109	66
2006	107	106	84	53
2007 (through July)	58	58	52	13

There is substantial cost for performance testing compared to annual testing. The cost of performance testing of four engines is \$9,500 to \$10,500. The cost of annual testing for four engines is \$2,500 to \$3,500.



Given that the engines at Treasure Island have been operating per manufacturer's specifications since startup, they have never exceeded their NOx emissions limits and are operated so few hours per year, Energy Alternatives believes that there is no environmental benefit gained from the additional cost of conducting performance testing every three years instead of every five years. Furthermore, in permit no. PSD-ML-R50007-05-01 Grand Casino Mille Lacs is required to conduct performance testing every five years on engines similar to those at Treasure Island.

The initial compliance test was conducted in October 2004. We have scheduled testing with Pace Analytical Services, Inc. for the week of October 29, 2007. If possible, we would like to change this to an annual test with a portable analyzer. Please contact me at (651) 341-2244 or Julie Miller, JEM Environmental, LLC at (763) 218-5081 if you need further information regarding this request.

Sincerely,

A handwritten signature in blue ink, appearing to read "Phil Kairis", is written over a horizontal line.

Phil Kairis
Vice President

Enclosures

Cc: Julie Miller, JEM Environmental, LLC